

1 **DOUGLAS A. LINDE, ESQ. (SBN 217584)(dal@lindelaw.net)**
2 **ERICA ALLEN, ESQ. (SBN 234922)(ela@lindelaw.net)**
3 **THE LINDE LAW FIRM**
4 **9000 Sunset Boulevard, Ste. 1025**
5 **Los Angeles, California 90069**
6 **Telephone (310) 203-9333**
7 **Fax (310) 203-9233**

8 Attorneys for Plaintiffs,
9 GLEN E. FRIEDMAN

10
11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 GLEN E. FRIEDMAN

15 Plaintiffs,

16 v.

17 THIERRY GUETTA a/k/a MR.
18 BRAINWASH; and DOES 1 through
19 10, inclusive,

20 Defendants.

) Case No. CV10-0014 DDP (JCx)
) Honorable Dean D. Pregerson
) Complaint Filed: January 4, 2010
)

) **ANSWER OF COUNTER-**
) **DEFENDANT GLEN E. FRIEDMAN**
) **TO DEFENANT'S COUNTER-**
) **CLAIM FOR DECLARATORY**
) **RELIEF AND ATTORNEYS' FEES**
)

21 **ANSWER**

22 Defendant GLEN E. FRIEDMAN ("Friedman") answers the Counterclaim
23 (hereinafter "Counterclaim") filed by THIERRY GUETTA a/k/a MR. BRAINWASH
24 ("Guetta"), as follows:

25 1. In Answer to Paragraph 1 of the Counterclaim, Friedman admits the
26 allegations of this paragraph.
27
28

1 2. In Answer to Paragraph 2 of the Counterclaim, Friedman admits the
2 allegations of this paragraph.
3

4 3. In Answer to Paragraph 3 of the Counterclaim, Friedman admits that
5 Guetta is an individual who can be located within this judicial district.
6

7 4. In Answer to Paragraph 4 of the Counterclaim, Friedman admits that he is
8 an individual who is a citizen of the State of New York.
9

10 **COUNTER CLAIM ONE**

11 **(Declaration of Non-Infringement of Copyright against all Counter-Defendants)**

12 5. In Answer to Paragraph 5 of the Counterclaim, no response is required to
13 this allegation.
14

15 6. In Answer to Paragraph 6 of the Counterclaim, Plaintiff admits the
16 allegations in this paragraph.
17

18 7. In Answer to Paragraph 7 of the Counterclaim, Plaintiff admits the
19 allegations in this paragraph.
20

21 8. In Answer to Paragraph 8 of the Counterclaim, Plaintiff denies this
22 allegation.
23

24 9. In Answer to Paragraph 9 of the Counterclaim, Plaintiff admits this
25 allegation.
26

27 **COUNTERCLAIM TWO**

28 **(Costs and Attorney's Fees under 17 U.S.C §505 against Counter-Defendant)**

First Affirmative Defense

(Failure To State A Claim)

1. The Counterclaim fails to state facts sufficient to constitute a claim for relief against Counter-Defendant.

Second Affirmative Defense

(Set-Off)

2. Counter-Defendant is entitled to a set-off, should any damages be awarded against it, of any amounts owed by Counter-Claimant to Counter-Defendant.

Third Affirmative Defense

(Additional Defenses)

3. Counter-Defendant hereby gives notice that it intends to rely upon any other defenses that may become available or appear during the discovery proceedings in this case and hereby reserve its right to amend this answer to assert any such defenses.

Dated: March 18, 2010

THE LINDE LAW FIRM

By: /s/Erica L. Allen

Douglas A. Linde

Erica L. Allen

Attorneys for Plaintiff/Counter-Defendant

GLEN E. FRIEDMAN

DEMAND FOR JURY TRIAL

Counter-Defendant hereby demands a trial by jury in this action pursuant to
F.R.C.P. 38 and the Seventh Amendment of the Constitution.

Dated: March 18, 2010

THE LINDE LAW FIRM

By:___/s/Erica L. Allen_____
Douglas A. Linde
Erica L. Allen
Attorneys for Plaintiff/Counter-Defendant
GLEN E. FRIEDMAN